



Federal Communications Commission  
Washington, D.C. 20554

July 17, 2013

**VIA ECFS ELECTRONIC DELIVERY**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Measuring Broadband American Program (Fixed), GN Docket No. 12-264

Dear Ms. Dortch:

On July 11, 2013, representatives of broadband providers, public interest groups, companies, and other organizations met in person and via conference call with Commission staff to discuss schedules and milestones of the fixed Measuring Broadband America (MBA) efforts, report on some data anomalies observed, and to provide updates on the in-home test study being conducted in collaboration with Georgia Tech.<sup>1</sup>

Mr. Walter Johnston, Chief, Electromagnetic Compatibility Division (EMCD) in the Office of Engineering and Technology (OET) and Mr. James Miller, Senior Attorney Advisor, EMCD/OET summarized current plans for September 2013 fixed measurements and ongoing preparation efforts including validation of the September panel participants. Progress on validation was ongoing and staff thanked participating providers for their continued efforts to conclude the efforts.

Mr. Miller and Mr. Johnston introduced Alex Salter, CEO Samknows Ltd. to discuss measurement anomalies observed on a subset of measurement servers operated on the M-lab platform. Mr. Salter noted that as part of a standard process, data from three different sets of measurement servers (research servers operated separately by M-Lab and Level 3, and on-net servers operated by ISPs) are continually compared prior to beginning formal testing. Data from these different sets of servers should normally agree quite closely. Mr. Salter stated that this testing had indicated that data tests performed on the M-Lab servers did not agree with those from the other two sets of servers and asked M-Lab representatives to review and report back to the group. Meredith Whittaker, Google Research Program Manager, explained that M-Lab representatives were aware of the problem and initial information suggested that a peering issue within the connecting links was a possible cause.

Mr. Johnston reviewed policies developed in 2012 for dealing with data anomalies. These basic principles were:

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<sup>1</sup> A list of attendees and presentation materials are attached to this filing in GN Docket No. 12-264.

1. All ISPs needed to be tested simultaneously with no impairments in the measurement process that might adversely affect the results from one or more ISPs;
2. To the extent that upon initiation of formal testing, impairments affected the collection of test data, up to one week of data could be discarded, declaring the test period a 'short month'
3. If impairments continued past a week, data could be collected in the following month on a day by day basis until the minimum required data set was collected.

Mr. Johnston discussed that a decision would need to be made regarding the options for testing in September based on the circumstances and in conformity with the express policies. It was suggested that a longer-term solution to addressing connectivity issues with measurement servers could be reviewed in a separate working group. David Young, VP Federal Regulatory Affairs Verizon offered to help lead a group to be formed to look at potential architecture improvements which could improve resiliency of the testing architecture in the future. Participants expressed support for reviewing the issues in the context of the working group.

Mr. Miller summarized progress on the in-home performance special study being undertaken by researchers at Georgia Technical Institute (GATech). He solicited feedback from the group on the project summary circulated by Matthew Oetting and Rajender Razdan, EMCD Engineering staff.<sup>2</sup> He discussed that the project summary was intended to supplement the technical papers provided at prior meetings authored by Prof. Nick Feamster, Assoc. Prof. GATech, and GATech researchers. Mr. Rajender reiterated that this report was a work in progress and solicited feedback from the attendees. Mr. Miller discussed that progress on the effort was being made but that the August 2013 start for the special study testing might be delayed to provide more time for preparation for the September 2013 fixed report testing. He explained that staff would provide progress updates on the special study at a future collaborative meeting.

Mr. Johnston and Mr. Miller concluded by thanking all the participants for their active participation in these meetings and encouraged participants to look for an invitation to an upcoming meeting via the collaborative distribution list in the coming weeks.

Sincerely,

/s/ James Miller

James Miller, Senior Attorney Advisor  
Electromagnetic Compatibility Division/OET  
Federal Communications Commission

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<sup>2</sup> The draft report "Locating Performance Problems in Home Networks" is attached to this filing in GN Docket No. 12-264.